

**Exhibit II**

**November 26, 2025 Email sent by Greg Taylor.**

Greg Taylor

Friday, December 19, 2025 at 4:19:11 PM Central Standard Time

**Subject:** Re: [AZ v. Avid Telecom] Replacement RFA Responses and Motion to Determine Sufficiency of First RFA Responses

**Date:** Wednesday, November 26, 2025 at 3:41:55 PM Central Standard Time

**From:** Greg Taylor <gtaylor@tlgdc.com>

**To:** Erin Leahy <erin.leahy@OhioAGO.gov>, Pelton, Sarah <Sarah.Pelton@azag.gov>, Neil Ende <nende@tlgdc.com>, Ritesh Warikallamath <rwarikallamath@tlgdc.com>

**CC:** 'Nayer, Tracy' <Tnayer@ncdoj.gov>, Dillon IV, John <John.DillonIV@azag.gov>, 'Martindale, Thomas L' <Thomas.Martindale@atg.in.gov>, 'Sparko, Rochelle' <rsparko@ncdoj.gov>, Emily Dietz <Emily.Dietz@OhioAGO.gov>, Ashley.Taylor@troutman.com <ashley.taylor@troutman.com>, Virginia Bell Flynn (Virginia.Flynn@troutman.com) <virginia.flynn@troutman.com>, Michael.Lacy@troutman.com <Michael.Lacy@troutman.com>, Swetnam, Douglas <douglas.swetnam@atg.in.gov>

**Attachments:** image001.png, image002.png, image003.png, image004.png, Reeves RFA Responses (as sent - 11-26-2025).pdf

Erin:

We have gone through our records and have determined the RFA responses for Defendants Lansky, Avid, and Reeves were produced 9.24.25. We received the attached email from Sarah Pelton October 17<sup>th</sup>, to advise of deficiencies in the Reeves Responses only (i.e., she did not express any concerns regarding Lansky or Avid).

During the status conference, you mentioned receiving a corrected version to the Reeves responses, and again in your email today. However, it was not clear until after having gone through the paper trail of emails that you are referring to a 2<sup>nd</sup> Reeves version of RFA responses that were made shortly after initial production and it was determined the responses had some privileged information in the responses. That information was removed and the responses supplemented.

Attached is a revised version of Reeves' RFA responses. Although we do not think our original responses create any material confusion, as a courtesy, we have conformed the first\third person references as we deemed appropriate.

The Lansky and Avid responses were produced in September and as far as we know, you have raised no issue with any of the defendants except Reeves (per Pelton email dated 10.17.25).

We hope this clears up the confusion regarding Defendants' responses.

Best,

Greg Taylor, of Counsel

Technology Law Group, LLC

80 E. Fifth St. | Second Floor | Edmond, OK 73034

T: +1 405.896.2266 | F: +1 405.701.6174

[gtaylor@tlgdc.com](mailto:gtaylor@tlgdc.com) | LinkedIn: Greg Taylor | Twitter: @telcoatty



**Greg Taylor**  
[telecomlawattorney.com](http://telecomlawattorney.com)

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